

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

BKY No. 02-50600

ADV No. 04-5_____

Invision of Duluth, Inc.,

Debtor.

Randall L. Seaver, Trustee,

Plaintiff,

COMPLAINT

vs.

SLM Financial Corp.,

Defendant.

Randall L. Seaver, Trustee ("Trustee") of the Bankruptcy Estate of Invision of Duluth, Inc. ("Debtor") as and for his Complaint against SLM Financial Corp. ("Defendant"), states and alleges as follows:

1. Trustee is the duly appointed Chapter 7 Trustee of the bankruptcy estate of the Debtor.
2. This bankruptcy case was commenced on July 24, 2002 by the filing of a Chapter 11 petition and was converted to a case under Chapter 7 on December 23, 2002.
3. This adversary proceeding is a core proceeding within the meaning of 28 U.S.C. §157(b)(2).
4. This court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §§157 and 1334. This case arises under 11 U.S.C. §§549 and 550.

5. The Defendant is an insider of the Debtor.

COUNT 1

6. Plaintiff realleges and reaffirms paragraph 1 through 5 above.

7. After commencement of this bankruptcy case, the Debtor made unauthorized payments and payments on account of pre-petition debt to the Defendant in the amount of not less than \$10,000. A copy of a check by which a \$10,000 post-payment was made is attached hereto as Exhibit A.

8. Said payments made the Defendant were unauthorized and recoverable by the Trustee pursuant to 11 U.S.C. §§549 and 550.

WHEREFORE, Plaintiff respectfully requests that this Court makes its Order:

1. Avoiding post-petition transfers of not less than \$10,000 in funds to the Defendant preserving those transfers for the benefit of the bankruptcy estate and entering judgment against Defendant in the amount of not less than \$10,000; and

2. Awarding the Plaintiff his costs and disbursements in this action and any other or further relief as the court deems just and equitable.

FULLER, SEAYER & RAMETTE, P.A.

Dated: July 14, 2004

By: /e/ Randall L. Seaver

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Attorneys for Plaintiff

EXHIBIT A